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**III.**  
**DEFENDANT'S SUPPLEMENTAL RESPONSE TO**  
**PLAINTIFFS' FIRST SET OF REQUEST**  
**FOR ADMISSIONS**  
**(RESPONSES NOs. 28, and 35)**

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*Attorney for Defendant*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE**  
**NORTHERN MARIANA ISLANDS**

<b>JOANNA ABELLANOSA, et al.,</b>	)	<b>Civil Action No. 05-0010</b>
	)	
	)	
<b>Plaintiffs.</b>	)	<b>DEFENDANT'S SUPPLEMENTAL</b>
<b>vs.</b>	)	<b>RESPONSE TO PLAINTIFFS'</b>
	)	<b>FIRST SET OF REQUEST</b>
<b>L&amp;T INTERNATIONAL CORP.</b>	)	<b>FOR ADMISSIONS</b>
	)	
<b>Defendant.</b>	)	

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Propounding Party: Plaintiffs, Joanna Abellanos, et. al.

Responding Party: Defendant, L&T International Corporation

**TO : PLAINTIFFS and THEIR ATTORNEY OF RECORD**

Pursuant to Federal Rules of Civil Procedure 36, Defendant, L&T International Corporation (Responding Defendant) hereby responds to Plaintiff First Set of Request for Admissions. The number of responses below correspond to the number of Plaintiffs' requests and in each case, L&T International reserves the right to supplement its response to any particular request a later time as new becomes available.

RECEIVED  
The Law Offices of  
Joe Hill  
Attorney at Law  
Date: 8/31/2006  
Time: 6:35 p.m.  
Rec'd by: LILY

1 **REQUEST NO. 21:** Admit that pursuant to the Nonresident Workers Act (3 CMC §§ 4437[c];  
2 4438[b]), defendant-employer was required to pay the fees for plaintiffs' health certificates.

3 **RESPONSE:** Objection Vague as to time. Responding Defendant denies that pursuant to the  
4 Nonresident Workers Act (3 CMC §§ 4437[c]; 4438[b]), defendant-employer was required to pay  
5 the fees for plaintiffs' health certificates prior to employment with the Responding Defendant.  
6

7 **REQUEST NO. 25:** Admit or deny that plaintiffs' employment was terminated without just cause.

8 **RESPONSE:** Responding Defendant denies that plaintiffs' employment was terminated without  
9 just cause.  
10

11 **REQUEST NO. 26:** Admit that defendant did not give each plaintiff ten (10) days advance written  
12 notice before termination.

13 **RESPONSE:** Responding Defendant denies that defendant did not give each plaintiff ten (10) days  
14 advance written notice before termination.  
15

16 **REQUEST NO. 28:** Admit that defendant hired Chinese workers who performed the work of Hand  
17 Packers during the period from February 1, 2004 through April 1, 2006.

18 **RESPONSE:** Admit.  
19


20 **REQUEST NO. 31:** Admit that plaintiffs did not read the substantive content of their employment  
21 contract prior to signing.

22 **RESPONSE:** Responding Defendant admits that some of the Plaintiffs testified in depositions that  
23 they did not read the substantive content of their employment contract prior to signing. Except to the  
24 extent admitted, L&T lacks sufficient information to admit or deny request No. 31 despite  
25 reasonable inquiry conducted to date.

1 **REQUEST NO. 35:** Admit that defendant is obligated to pay plaintiffs' return airfare to the  
2 Philippines.

3 **RESPONSE:** Responding Defendant admits that defendant is obligated to pay plaintiffs' return  
4 airfare to the Philippines to the extent provided for in the non-resident worker contract and according  
5 to CNMI law.

6  
7 Dated this 30<sup>th</sup> day of August, 2006.

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12 **COLIN M. THOMSON**  
13 Attorney at Law  
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